

DRRT

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Attorneys for Creditors

DRRT CLAIMANTS

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects Both Debtors

* All papers shall be filed in Lead Case 19-30088-DM

BK Case No.: 19-30088-DM (Lead Case)
(Jointly Administered)

Chapter 11

**NOTICE OF HEARING ON AMENDED
MOTION FOR RELIEF FROM ORDERS BY
DEFAULT DISALLOWING AND
EXPUNGING PROOFS OF CLAIMS
PURSUANT TO REORGANIZED
DEBTORS' ELEVENTH AND
THIRTEENTH SECURITIES CLAIMS
OMNIBUS OBJECTIONS (CLAIMS
BARRED BY THE STATUTE OF REPOSE)**

Date: January 18, 2022
Time: 10:00 a.m.
Location: Telephonic / Videoconference
Judge: Honorable Dennis Montali¹

¹ Paragraph 10 of General Order 38 (Seventh Amended) provides that "[u]nless otherwise ordered by the presiding judge, all notices of any motion or application filed with the court and served on any party which sets a



1 **TO: THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **COURT; DEBTORS PG&E CORPORATION AND PACIFIC GAS & ELECTRIC**
3 **COMPANY; ALL PARTIES IN INTEREST; AND COUNSEL OF RECORD (IF ANY):**

4 **PLEASE TAKE NOTICE** that on January 18, 2022 at 10:00 a.m., or as soon thereafter
5 as the matter may be heard, before the Honorable Dennis Montali of the United States
6 Bankruptcy Court, DRRT as the duly appointed claims filing representative for individual
7 claimants Bayerninvest Kapitalverwaltungsgesellschaft MBH, Credit Suisse Funds AG, Deka
8 Investment GMBH, Giam Generali Insurance Asset Management, Helaba Invest
9 Kapitalanlagegesellschaft MBH, Internationale Kapitalanlagegesellschaft MBH, Internationale
10 Kapitalanlagegesellschaft MBH, Kaiser Permanente, Metzler Asset Management GMBH, Swiss
11 Reinsurance Company Ltd., UBS Fund Management (Switzerland) AG, UBS Fund Management
12 Luxembourg S.A., Meag Munich Ergo Kapitalanlagegesellschaft MBH, (collectively, the
13 “DRRT Claimants”) will move (the “Motion”) the above-referenced Court for entry of an order
14 vacating the *Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized*
15 *Debtors’ Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of*
16 *Repose)* [Dkt. No. 11216] issued on September 9, 2021 and the *Order Disallowing and*
17 *Expunging Proofs of Claim Pursuant to Reorganized Debtors’ Thirteenth Securities Claims*
18 *Omnibus Objection (Claims Barred by the Statute of Repose)* [Dkt. No. 11315] issued on
19 September 24, 2021 as applied to those claims filed by the DRRT Claimants.

20 The Motion is brought pursuant to Federal Rules of Bankruptcy Procedure 60(b) and
21 9014, and Bankruptcy Local Rule 9014-1(c)(1).

22 **PLESAE TAKE FURTHER NOTICE** that notwithstanding the location of the hearing
23 set forth above, Paragraph 10 of *General Order 38 (Seventh Amended)* provides that “[u]nless

24 _____
25 hearing date for the motion or application must state that the hearing will not be conducted in the presiding judge’s
26 courtroom but instead will be conducted by telephone or video, and include the following language: ‘All interested
27 parties should consult the Bankruptcy Court’s website at www.canb.uscourts.gov for information about court
28 operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how
to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing,
you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the
Bankruptcy Court’s website.’” See [https://www.canb.uscourts.gov/sites/default/files/generalorders/Seventh](https://www.canb.uscourts.gov/sites/default/files/generalorders/SeventhAmendedGO38.pdf)
AmendedGO38.pdf.

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BK CASE NO. 19-30088-DM

NOTICE OF HEARING ON AMENDED MOTION FOR RELIEF FROM ORDERS BY DEFAULT DISALLOWING AND EXPUNGING
PROOFS OF CLAIMS PURSUANT TO REORGANIZED DEBTORS’ ELEVENTH AND THIRTEENTH SECURITIES CLAIMS
OMNIBUS OBJECTIONS (CLAIMS BARRED BY THE STATUTE OF REPOSE)

1 otherwise ordered by the presiding judge, all notices of any motion or application filed with the
2 court and served on any party which sets a hearing date for the motion or application must state
3 that **the hearing will not be conducted in the presiding judge's courtroom but instead will**
4 **be conducted by telephone or video, and include the following language:** 'All interested
5 parties should consult the Bankruptcy Court's website at www.canb.uscourts.gov for information
6 about court operations during the COVID-19 pandemic. The Bankruptcy Court's website
7 provides information regarding how to arrange a telephonic or video appearance. If you have
8 any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court
9 by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.'"

10 See <https://www.canb.uscourts.gov/sites/default/files/general-orders/SeventhAmended>
11 GO38.pdf

12 **PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rule**
13 **9014-1(c)(1), any opposition shall be filed and served on the initiating party at least**
14 **fourteen (14) days prior to the hearing on the Motion.** Any opposition must set forth all
15 relevant facts and any relevant legal authority, must be supported by affidavits or declarations
16 that conform to the provisions of Bankruptcy Local Rule 9013-1(d), and must be filed with the
17 Bankruptcy Court and served on counsel for the DRRT Claimants, MEYER LAW GROUP LLP,
18 Attn: Brent D. Meyer, Esq., 268 Bush Street #3639, San Francisco, California 94014.

19 **PLEASE TAKE FURTHER NOTICE** that failure to file and serve a written objection
20 to the Motion in a timely manner may result in entry of an order granting the requested relief by
21 default, and the Court may preclude oral opposition to the Motion at the hearing.

22
23 Dated: December 21, 2021

DRRT

24 By: /s/ JARED LAY

25 Jared Lay, Esq.
26 Attorneys for Creditors
27 DRRT CLAIMANTS
28

1 Dated: December 21, 2021

MEYER LAW GROUP LLP

2 By: /s/ BRENT D. MEYER

3 Brent D. Meyer, Esq.
4 Attorneys for Creditors
5 DRRT CLAIMANTS
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